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UNITED STATES BANKRUPTCY COURT  
 EASTERN DISTRICT OF NEW YORK

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In re:	:	
	:	Chapter 11
MEMORY LANE MUSIC GROUP LLC, <i>et al</i> ,	:	Case No. 22-70838-AST
	:	
Debtors.	:	Jointly Administered
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**DEBTOR'S OBJECTIONS AND RESPONSES TO  
 BUNCH CREDITORS' FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Rules 7026 and 7033 of the Federal Rules of Bankruptcy Procedure, Memory Lane Music Group LLC, Scion Three Music LLC, Scion Four Music LLC and Larry Spier Music LLC (collectively, "Debtors") respond to the *Bunch Creditors' First Set of Interrogatories to Debtors Regarding Debtors' Joint Subchapter V Plan of Reorganization*.

**GENERAL OBJECTIONS AND CONDITION TO RESPONSE**

1. The Debtors object to the interrogatories to the extent they seek or purport to seek information that is protected by the attorney-client privilege, the work product doctrine or any other applicable privileges, laws or rules. The Debtors do not waive the attorney-client privilege, the work product privilege or any other lawfully recognized privilege or immunity from disclosure that may be applicable to the information requested. The Debtors will only give responsive non-privileged answers.

2. This response is subject to, and without in any way waiving or intending to waive, all questions or objections as to competency, relevancy, materiality, privilege and admissibility as evidence, or for any other purpose, of any of the information produced or the subject matter thereof in the trial of this dispute or any other action or proceeding.

3. These general objections and conditions apply to all interrogatories and are incorporated by reference into each response.

### **SPECIFIC OBJECTIONS AND RESPONSES**

#### **Interrogatory No. 1**

Identify all people and entities to whom you tried to sell the Administration Agreements and provide their Contact Information.

#### **Response to Interrogatory No. 1**

This information is subject to non-disclosure agreements.

#### **Interrogatory No. 2**

Identify all people and entities involved in advising or determining that the Administration Agreements were “not easily transferable and have little or no value” and provide their Contact Information.

#### **Response to Interrogatory No. 2**

Mark Spier  
66 Summit Road  
Port Washington, NY 11050  
*mark@memorylanemusicgroup.com*

Norton Lazarus  
OEM Capital Corp.  
P.O. Box 4193  
New York, NY 10163  
*nwl@oemcapitalcorp.com*

#### **Interrogatory No. 3**

Identify all people and entities involved in advising or determining that the musical works or song titles that Memory Lane claims to own are “worth approximately \$300,000 after selling costs.”

**Response to Interrogatory No. 3**

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**Interrogatory No. 4**

Identify all people and entities involved in advising or determining that the “rights administration business of the four Debtors is not salable and has no value” and provide their Contact Information.

**Response to Interrogatory No. 4**

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**Interrogatory No. 5**

Identify how much you expect each professional will be paid as an Allowed Professional Fee Claim.

**Response to Interrogatory No. 5**

The Debtors object to this interrogatory. The estimate of allowed professional fees in the Plan is aggregate, which is all that the Debtors are required to disclose. The amount of each individual professional’s allowed claim is irrelevant to whether the Debtors will be able to demonstrate at the confirmation hearing that they will be able to satisfy the claims.

**Interrogatory No. 6**

Identify for what purposes or services “additional attorneys’ fees” would be incurred under a chapter 7 liquidation as stated in Article IX of the Plan.

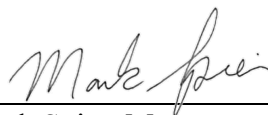
**Response to Interrogatory No. 6**

The Debtors object to this interrogatory. The Debtors are not required to explain to the *Bunch* Creditors what a chapter 7 trustee and the trustee’s professionals would do upon conversion that would result in an increase of attorney fee administrative expense claims.

Dated: Port Washington, New York  
September 12, 2022

Answers to Interrogatories:

MEMORY LANE MUSIC GROUP LLC, *et al.*  
By:



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Mark Spier, Manager

Dated: New York, New York  
September 12, 2022

RICH MICHAELSON MAGALIFF, LLP  
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By:



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